

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN**

LEAR CORPORATION,

Plaintiff,

v.

**NHK SEATING OF AMERICA,
INC.**

Defendants.

Case No. 2:13-cv-12937-LJM-RSW

JURY TRIAL DEMANDED

**AMENDED UNOPPOSED MOTION FOR
LEAVE TO FILE UNDER SEAL**

Plaintiff Lear Corporation (“Lear”) respectfully submits this unopposed Motion for Leave to File Under Seal contents of Exhibit 46 submitted in connection with Lear’s Supplemental Brief in Support of Lear’s Motion for Leave to Amend Complaint (Motion, Dkt. #47; Reply, Dkt.#50; Supplemental Brief in Support).

The authority for sealing such documents is pursuant to Local Rule 5.3, and the Stipulated Protective Order (Dkt. #27) entered in the present case.

The Supplemental Brief in Support references information from a document produced by NHK Seating of America, Inc. (“NHK”) during discovery, which pursuant to the Protective Order, has been designated as “Highly Confidential – Attorney’s Eyes Only.” Lear believes this information designated as confidential is necessary to support Lear’s Supplemental Brief in Support of its Motion to file an amended complaint. Therefore, Lear requests the following documents to be filed under seal:

Motion For Leave To File Amended Complaint	
Document	Contents
Exhibit 46	<p>Toyota Motor Engineering & Manufacturing North America, Inc. Active H/R Localization Plan</p> <p>NHK designated the document “Highly Confidential – Attorney’s Eyes Only”</p>
Lear’s Supplemental Brief in Support of Lear’s Motion for Leave to Amend Complaint	References specific confidential information highlighted above in Ex. 46

Lear is not asking the Court to seal any portion of the Motion for Leave to File an Amended Complaint (Dkt. #47) or any portion of Lear’s Reply in Support (Dkt. #50). Instead, Lear is requesting the Court to seal the above-identified exhibit and Lear’s Supplemental Brief in Support because NHK has designated the underlying document as containing or referring to “trade secrets or other confidential research, development, business or financial information, or other

confidential commercial information, and that, if disclosed to a business competitor, would tend to damage the party's competitive position." (Protective Order, Dkt. #27 at 1.)

Pursuant to Local Rule 7.1(a), Lear has conferred with counsel for NHK, and NHK does not oppose the present motion. A proposed stipulated order consistent with the relief requested in this motion is also being submitted for approval.

Respectfully submitted,

BROOKS KUSHMAN P.C.

Dated: November 14, 2017

/s/ Todd W. Dishman

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Attorneys for Plaintiff Lear Corporation

CERTIFICATE OF ELECTRONIC SERVICE

I hereby certify that on November 14, 2017, I electronically filed the foregoing **AMENDED UNOPPOSED MOTION FOR LEAVE TO FILE UNDER SEAL** with the Clerk of the Court for the Eastern District of Michigan using the ECF System. I submitted copies of all sealed documents via electronic means to the registered participants of the ECF System as listed on the Court's Notice of Electronic Filing:

I further certify that I have mailed by United States Postal Service the paper to the following non-participants in the ECF System: None.

Respectfully submitted,

BROOKS KUSHMAN P.C.

/s/ Todd W. Dishman
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